

lines 1-8) but were not included in the drawings. By the present amendment the Figure 2 has been amended in red, to include these reference numerals and withdrawal of the objection is therefore respectfully requested.

III. Rejection of Claims 3-5 Under 35 U.S.C. § 112, second paragraph:

Also in the Action, Claims 3-5 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. In particular, in Claims 3-5 “the pressure” lacked clear antecedent basis. By the present amendment Claims 3-5 have been amended in an effort to overcome this rejection. Withdrawal of the rejection of Claims 3-5 under 35 U.S.C. §112, second paragraph is therefore respectfully requested.

IV. Rejection of Claims 1-8 Under 35 U.S.C. § 103:

Also in the Action, Claims 1-8 were rejected under 35 U.S.C. § 103 as being unpatentable over Peters et al (European Patent Application 207,069). As is disclosed in the specification, depicted in the drawings and claimed by Peters et al., the invention of ‘069 is a method and device for cutting a material with liquid jets discharged by nozzles located on both sides of the material. Specifically, Peters et al. discloses a method of cutting a flat composite honeycomb material 7 with covering layers 71, 72 by nozzle heads 11, 12 on both sides of workpiece surfaces 711, 721.

In contrast, Claim 1 of the present application has been amended to recite, *inter alia*, a method for removing honeycomb and braze from a substrate, the honeycomb having a base and a ribbon direction, comprising: directing a pressurized liquid at an angle of less than about 90° between the liquid and the substrate, through at least one orifice of a nozzle such that the liquid forms a liquid stream upon exiting the nozzle, the liquid stream striking the substrate at the base of the honeycomb, thereby removing the honeycomb and braze from the substrate, whereby the substrate may be reused.

Peters et al. does not disclose or suggest such a method. In particular, Peters et al. is concerned with cutting through a material comprised of honeycomb

wherein the cutting is achieved by a pair of nozzles located on either side of the material. The present application, in contrast, claims the removal of honeycomb from a substrate whereby the substrate may be reused. Assuming *arguendo* that cutting honeycomb is a method of removal, the method disclosed and claimed in Peters et al. utilizes liquid jets disposed on either side of the material to be cut, which would necessarily cause damage to the substrate in the present application since the honeycomb in the present application is adhered on one side to a substrate.

Accordingly, Claims 1-8 are believed to be directed to patentable subject matter and withdrawal of the rejection under 35 U.S.C. § 103 as being unpatentable over Peters et al. with respect to Claim 1 and Claims 2-8, which depend therefrom, is therefore respectfully requested.

V. Rejection of Claims 1-8 Under 35 U.S.C. § 103:

Claims 1-8 were further rejected under 35 U.S.C. § 103 as being unpatentable over McComas (US Patent No. '721) and Peters et al. McComas discloses the removal of coating material, specifically the removal of abradable, wear resistant, thermal barrier, abrasive and hard facing coatings which have been applied by either plasma spray or sintering, utilizing liquid jet erosion. As stated above, Peters et al. discloses a method and device for cutting a material comprised of honeycomb with liquid jets discharged by nozzles located on both sides of the material.

There is no teaching or suggestion to combine the invention of Peters et al. which discloses cutting a material comprised of honeycomb with McComas '721 which is directed to removing plasma sprayed and sintered coatings from a substrate. As stated above, to utilize the method of Peters et al with honeycomb, or any material adhered to a substrate would necessarily cause damage to the substrate because Peters et al. utilizes liquid jets disposed on either side of the material to be cut. Therefore, to combine these two references would be unworkable since cutting through a workpiece material as disclosed in Peters is inconsistent with the removal of a material from a substrate as disclosed in McComas.


Since there is no teaching or suggestion to combine the invention of Peters with that of McComas, and since neither reference discloses or suggest, either alone or in combination the invention as claimed in amended Claim 1 of the present application, Applicants submit that Claims 1-8 are directed to patentable subject matter and withdrawal of the rejection under 35 U.S.C. § 103 as being unpatentable over Peters et al. in view of McComas with respect to Claim 1 and Claims 2-8, which depend therefrom, is therefore respectfully requested.

VII. Conclusion:

In view of the foregoing amendments and remarks, it is respectfully submitted that all of the claims pending in this application, namely Claims 1-8 are in condition for allowance, and such is earnestly solicited. Should the Examiner believe that a telephone or personal interview may facilitate resolution of any remaining matters, Applicants' attorney may be contacted by telephone at the number indicated below.

Respectfully Submitted,

M. ANTHONY STONE ET AL

By 
Jodi-Ann McLane
Reg. No. 36,215

United Technologies Corporation
Patent Department - MS 524
United Technologies Building
Hartford, CT 06101
(203) 728-7966

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